

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Lisa Nguyen ) Case No: 18-16367  
Debtor ) Chapter 13  
 )  
 )  
 )  
 )

**OBJECTION OF MOTION FOR IN REM RELIEF FROM THE  
AUTOMATIC STAY**

Lisa Nguyen, debtor in the above-captioned case (the “Debtor”), through her undersigned counsel, Gerald R. Clarke, Esquire, hereby objects to Motion to for In Rem Relief From the Automatic Stay filed by Movants Mark Knouse, Lynn Brinker and Kim Beidler:

1. The Debtor has made all post-petition mortgage payments on a timely basis.
2. The mortgage agreement does not require the Debtor to pay 1/12 of real estate taxes in addition to the monthly mortgage payment as averred in the Motion.
3. Accordingly, the Debtor has not defaulted on her mortgage since her bankruptcy filing.
4. The Debtor has been in contact with Montgomery County Tax Bureau to work out payment arrangements.
5. The Debtor has attempted to make arrangements with the Movants in order to stay in the property and suggested arrangements have been denied.
6. The filing of this bankruptcy matter and the previous bankruptcy matter was filed for the sole purpose of allowing the Debtor to remain in the house and not, as suggested by the Movant, for the purpose of preventing foreclosure on the property.

WHEREFORE, the Debtor respectfully requests that the Court enter an order in the form annexed hereto, denying the Motion of the Movant.

Dated: February 18, 2019

/s/ Gerald R. Clarke  
Gerald R. Clarke  
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**ORDER DENYING MOTION FOR RELIEF  
OF AUTOMATIC STAY**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 201\_\_\_\_, upon consideration of the Motion for relief from the automatic stay filed by the Movant, said motion is denied.

BY THE COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
Hon.  
Bankruptcy Judge

Cc: Debtor  
Counsel for Debtors  
Office of the U.S. Trustee  
Standing Chapter 13 Trustee  
Creditors